

ORIGINAL

FILED IN CHAMBERS
U.S.D.C. Atlanta

MAY 15 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

JAMES N. HATTEN, Clerk

By: *gy*

UNITED STATES OF AMERICA

v.

VINCETTI DEUN DANIEL,
JETERUS LAVEE WILEY,
EDWARD ANTWAN JONES,
MARILYN RENA JONES,
JESUS PINEDA-PINEDA, AND
JENNIFER LEE HOLMES

Case No. 4:19-CR-33

Criminal Indictment

UNDER SEAL

THE GRAND JURY CHARGES THAT:

Count One

Beginning by at least September 2017, and continuing to on or about the date of this Indictment, the exact dates unknown to the Grand Jury, in the Northern District of Georgia and elsewhere, the defendants,

VINCETTI DEUN DANIEL,
JETERUS LAVEE WILEY,
EDWARD ANTWAN JONES,
MARILYN RENA JONES, AND
JESUS PINEDA-PINEDA,

did knowingly and willfully combine, conspire, and agree with each other and with others, both known and unknown to the Grand Jury, to violate Title 21, United States Code, Section 841(a)(1), that is, to possess with intent to distribute a controlled substance, said conspiracy involving:

- a. 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(A), as to VINCETTI DEUN DANIEL, JETERUS LAVEE WILEY, EDWARD ANTWAN JONES, and MARILYN RENA JONES; and
- b. 100 grams or more of a mixture or substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(B), as to VINCETTI DEUN DANIEL and JESUS PINEDA-PINEDA;

all in violation of Title 21, United States Code, Section 846.

Count Two

On or about September 7, 2017, in the Northern District of Georgia, the defendant,

JETERUS LAVEE WILEY,

knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

Count Three

On or about September 13, 2017, in the Northern District of Georgia, the defendant,

JETERUS LAVEE WILEY,

knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

Count Four

On or about September 15, 2017, in the Northern District of Georgia, the defendant,

JETERUS LAVEE WILEY,

knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

Count Five

On or about September 28, 2017, in the Northern District of Georgia, the defendant,

JETERUS LAVEE WILEY,

knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

Count Six

On or about October 25, 2017, in the Northern District of Georgia, the defendant,
JETERUS LAVEE WILEY,
knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 5 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(B).

Count Seven

On or about January 12, 2018, in the Northern District of Georgia, the defendant,
JETERUS LAVEE WILEY,
knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A).

Count Eight

On or about April 6, 2018, in the Northern District of Georgia, the defendants,
VINCETTI DEUN DANIEL AND
JETERUS LAVEE WILEY,
aided and abetted by each other, did knowingly and intentionally use a communication facility, that is, a telephone, in committing and facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 846, all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

Count Nine

On or about April 14, 2018, in the Northern District of Georgia, the defendant,
JETERUS LAVEE WILEY,
did knowingly and intentionally possess a firearm, that is, a Smith and Wesson,
model SW40VE, .40 caliber semi-automatic pistol, in furtherance of a drug
trafficking crime for which the defendant may be prosecuted in a court of the United
States, that is, conspiracy to possess with intent to distribute a controlled substance
as set forth in Count One of this Indictment; all in violation of Title 18, United States
Code, Section 924(c)(1)(A)(i).

Count Ten

On or about April 14, 2018, in the Northern District of Georgia, the defendants,
JETERUS LAVEE WILEY AND
JENNIFER LEE HOLMES,
aided and abetted by each other, having been convicted of a crime punishable by
imprisonment for a term exceeding one year, did knowingly and intentionally
possess in and affecting interstate and foreign commerce a firearm, that is, a Smith
and Wesson, model SW40VE, .40 caliber semi-automatic pistol, all in violation of
Title 18, United States Code, Section 922(g)(1) and Title 18, United States Code,
Section 2.

Count Eleven

On or about April 24, 2018, in the Northern District of Georgia, the defendant,
JETERUS LAVEE WILEY,
knowingly and intentionally possessed with intent to distribute a controlled
substance, said act involving 5 grams or more of methamphetamine, a Schedule II
controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1)
and (b)(1)(B).

Count Twelve

On or about May 23, 2018, in the Northern District of Georgia, the defendants,
VINCETTI DEUN DANIEL AND
JETERUS LAVEE WILEY,
aided and abetted by each other, did knowingly and intentionally use a
communication facility, that is, a telephone, in committing and facilitating the
commission of any act or acts constituting a felony under Title 21, United States
Code, Sections 846, all in violation of Title 21, United States Code, Section 843(b)
and Title 18, United States Code, Section 2.

Count Thirteen

On or about July 16, 2018, in the Northern District of Georgia, the defendants,
VINCETTI DEUN DANIEL,
EDWARD ANTWAN JONES, AND
MARILYN RENA JONES,

aided and abetted by each other, knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 50 grams or more of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(A) and Title 18, United States Code, Section 2.

Count Fourteen

On or about July 18, 2018, in the Northern District of Georgia, the defendants,

VINCETTI DEUN DANIEL AND
JETERUS LAVEE WILEY,

aided and abetted by each other, did knowingly and intentionally use a communication facility, that is, a telephone, in committing and facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 846, all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

Count Fifteen

On or about September 10, 2018, in the Northern District of Georgia, the defendants,

VINCETTI DEUN DANIEL AND
JETERUS LAVEE WILEY,

aided and abetted by each other, did knowingly and intentionally use a communication facility, that is, a telephone, in committing and facilitating the commission of any act or acts constituting a felony under Title 21, United States Code, Sections 846, all in violation of Title 21, United States Code, Section 843(b) and Title 18, United States Code, Section 2.

Count Sixteen

On or about November 28, 2018, in the Northern District of Georgia, the defendants,

VINCETTI DEUN DANIEL AND
JESUS PINEDA-PINEDA,

aided and abetted by each other, knowingly and intentionally possessed with intent to distribute a controlled substance, said act involving 100 grams or more of a mixture and substance containing a detectable amount of heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C) and Title 18, United States Code, Section 2.

Forfeiture

Upon conviction for the offenses alleged in Counts One, Two, Three, Four, Five, Six, Seven, Eight, Eleven, Twelve, Thirteen, Fourteen, Fifteen or Sixteen of the Indictment, the defendants,

VINCETTI DEUN DANIEL,
JETERUS LAVEE WILEY,
EDWARD ANTWAN JONES,
MARILYN RENA JONES, AND
JESUS PINEDA-PINEDA,

shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds the person obtained, directly or indirectly, as a result of said violation and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violations, including, but not limited to, the following:

- (a) MONEY JUDGMENT: A sum of money in United States currency representing the amount of proceeds obtained as a result of each offense for which the defendant is convicted;
- (b) \$14,350 in United States currency seized on November 28, 2018;

If, as a result of any act or omission of the defendant, any property subject to forfeiture:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without undue complexity or difficulty;

the United States intends, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

A True BILL
[Signature]
FOREPERSON

BYUNG J. PAK
United States Attorney

[Signature]

LISA W. TARVIN
Assistant United States Attorney
Georgia Bar No. 574960

[Signature]

TREVOR WILMOT
Assistant United States Attorney
Georgia Bar No. 936961

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ALEX JOSEPH
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